



March 15, 2010

Reply to the Attn: Office of Chief Counsel

MEMORANDUM FOR RECORD

FROM: Chief Counsel

SUBJECT: Blanket approval to Attend a Pre-Launch Reception Sponsored
by Jacobs Technology, Inc., NASA Test Operations Group

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

NASA invitees, accompanied by their spouses or guests, may attend a pre-launch reception sponsored by Jacobs Technology, Inc., NASA Test Operations Group (Jacobs, NTOG), at the Doubletree Hotel, Cocoa Beach, Florida, on Saturday, April 3, 2010, from 6:00-8:00 p.m. This event is to be held in conjunction with the launch of STS-131 at the Kennedy Space Center.

This event will be a widely-attended gathering of approximately 150 representatives of government, the aerospace industry and the community. The reception will permit NASA employees to discuss and celebrate with other attendees their collaborative efforts in assuring the execution of continued safe space exploration. Hot hors d'oeuvres, which will be provided by Jacobs, NTOG are valued at approximately \$10 per person.

I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will help to raise NASA's profile with national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's objectives. Given the purpose of the event, the broad attendance anticipated, and the modest market value of this social event, I have determined that the value to the agency in having employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect Jacobs, NTOG are not covered in this determination and should seek a determination pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events from their local ethics counselor.

Jacobs Engineering is a lobbying organization and Jacobs, NTOG is its subsidiary, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of the refreshments they consume at the reception.

Questions regarding this determination may be addressed to the undersigned at 228-688-1587.

A handwritten signature in black ink, appearing to read 'A E Grose', is written over the printed name.

Amy E. Grose
Chief Counsel